

Direct Certification (DC) FAQs

Q: When is the best time to run DC?

- A. Running DC *before* you distribute school meal applications for the upcoming school year saves time and effort for you and parents. You can run DC for the following school year beginning on July 1, even if your school enrollment process isn't complete.

DC TIP: Running DC prior to the start of the school year will allow you to claim eligible students (those that match as an S, T, O, or E) beginning the first day of the school year. This is especially helpful for new students since free meals may only be claimed from the application approval or DC date. Approvals may not be backdated.

Q: How often should I run DC?

- A. You may run DC as often as you like and frequent runs are encouraged. All schools participating in the School Meal Programs are required to run DC at least three times during the school year: 1) at or around the beginning of the school year, 2) three months after the first run and 3) six months after the first run. Running DC more often will help you use the process efficiently, make sure newly eligible students have access to meal benefits, and reduce paperwork all year.

DC TIP: Along with the three mandated times, run DC right before October 1, when your pool of applications for verification is determined. Because directly certified students are eligible for free meals without an application, they do not need to be included in the verification sample in October, which means fewer applications to verify.

Q: Our school does not have an IT department. Who should we contact for technical support?

- A. For technical questions with the match process contact the DCF Help Desk at 608-327-0840. For technical questions related to your software, contact your software vendor.

Q: A student who matches via DC also has an application submitted. Which one do I use?

- A. **DC overrides a paper application.** Even if the family applies on paper, all students who match through DC should be noted as “directly certified” in your student database. You would also report these students as being *directly certified* when the online Verification Summary Report is completed. Keep your application on-site in a separate place; it should not be thrown away.

Q: Once we find out that students are eligible for free meals via DC, are they only eligible as of that day or can we back date to the start of school or first day of that month?

- A. Approvals may not be backdated. For directly certified students, the approval date is the run date listed at the top of the matched list. If you receive notification that a student is a member of a matched student's household, you must use the date that you received this notification as the approval date. Be sure to keep documentation of all original DC matched lists before they are downloaded into any software program at your district. As with paper applications, once students are directly certified, they remain eligible for free meals through the end of the school year and up to 30 operating days into the next school year.

DC TIP: Create a DC folder on your computer to store all electronic DC files and create a file folder to house all paper DC documents.

Q: Can I just submit the names of the new students during the year or must I send my entire enrollment again?

- A. Yes, you may submit just the new names to see if they match. But you should also still periodically run a list containing students who did not match in previous runs, as children frequently get signed up for FoodShare or W-2 throughout the year or you may catch a new foster child. Even if a student didn't match previously, they may match at the time of a subsequent DC run. You must submit your entire enrollment list at the first mandated DC period (at or around the beginning of the school year). During subsequent mandated periods (three months after the first run and six months after the first run) you must, at a minimum, submit a list containing students who did not match on previous runs, although, you are still able to submit your full student list if you choose.

Q: We do not have any foster children at our school and only one family that receives FoodShare or W-2 cash benefits. This seems like a lot of work to do just for one family. Do we have to do DC?

- A. Yes, running DC is a federal requirement for all School Food Authorities participating in the School Meal Programs. In addition to the requirement to run DC at least three times during the school year, families enrolled in FoodShare or W-2 cash benefits may not realize their children are also eligible for free meals at school, or may not feel comfortable applying. DC can help ensure all children eligible to receive free meals can receive them. If families with foster children are also unaware of these benefits, they may not notify the school of their child's status.

Q. I know that free meal eligibility can be extended to students who were not identified as directly certified, but are part of a household that is enrolled in FoodShare or W-2 cash benefits. Are students in households of foster children also categorically eligible for free meals benefits?

- A. Effective October 1, 2010 children formally placed in foster care are categorically eligible for free meals. However, having a foster child reside in a household does not automatically extend benefits to all children in the same manner as participation in FoodShare or W-2 cash benefits. Benefits cannot be extended to students in households of foster children unless that household is also enrolled in FoodShare or W-2 cash benefits.

Q. What happened to the B, F, and L codes? I ran DC and no longer see these codes.

- A. The B, F, and L codes are still around, but they are no longer eligibility codes. They are now designated as error codes and you should only see them in records where you have an error in formatting or missing data. They will appear at the top of the results file you receive from the match. You no longer see them as eligibility codes because Soundex technology has been implemented. Soundex allows names to be tagged as matches based on sound rather than spelling, thus reducing errors from misspelling and ultimately increasing accuracy of matching. For further information on eligibility and error codes you may access the “Direct Certification Eligibility Codes” document online here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-codes.pdf>.

Q. Can I just call households and let them know that one or more of their students is eligible for free meals based on DC?

- A. No, the household must receive written notification of eligibility based on DC. Using the DC Parent/Guardian Notification Letter (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-approval-letter.doc>) allows households to notify the school if there are other students in the household not identified through DC that would now be eligible for free meals based on extension of benefits. It also has a place where the household can sign that they want to decline the benefits, should they choose to do so. Notification of free meal eligibility through DC may also be done through e-mail if the school has an e-mail address for a parent or guardian.

Q. If we have a student whose parents are divorced or separated, but share custody, do we have to notify both households of the student’s eligibility for free meals?

A. Yes, these situations should be handled in the same manner that the school notifies both parents about student grades, etc. The DC notification letter also gives both households the opportunity to identify if there are any other children living in either household that would then be eligible for free meals based on extension of benefits.

Q. What if one parent wants to refuse the benefits in the situation described above?

A. This parent would only be able to decline the benefits of free meals for this student when the student was actually residing with him/her and would need to provide the school with a schedule, so the school would be able to correctly claim the child as paid when residing with this parent, and free when residing with the other parent. Make sure to always get a request to decline free benefits based on DC in writing and maintain that documentation with your other program records.

Q. I have a family who submitted a paper application for school meals with a case number; however the students showed up as ‘N’ on the direct certification list. Can you shed some light on this issue?

A. There are many reasons why these students may have shown up as an ‘N’ on the direct certification run. It is possible that the particular household is on FoodShare or W-2 cash benefits, but the child is not listed on the FoodShare or W-2 cash benefits account. There could have been a misspelling of a student’s name in the state system and that student is missed. Regardless, as long as any household member is receiving FoodShare or W-2 cash benefits with a valid case number, you should take their application at face value and indicate they are eligible for free meal benefits. In Wisconsin, W-2 cash benefits and FoodShare case numbers are ten digits in length.

Categorical Eligibility is explained in the USDA’s [Eligibility Manual for School Meals](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-for-school-meals-july-2015.pdf), July 2015 which is posted at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-for-school-meals-july-2015.pdf>

Q. Our school/district has students who qualify for free meal benefits via direct certification; but other children “in the same family” that don’t qualify. How can that be possible?

A. If a student qualifies for free meal benefits via direct certification with an S, T, O, or E code, the Determining Official should extend eligibility for free meals to all students in the household. {These children are also considered directly certified} Siblings may be ‘N’ on the direct certification list for the same reasons noted in the above question. It is possible that the sibling is not listed on the FoodShare or W-2 cash benefits account, or

perhaps there was a misspelling of that student's name in the state system. While we are working very hard to improve the direct certification system and make it as accurate as possible, technology itself is not always perfect. That is one reason we make sure to have safeguards in place like extending of eligibility for household members. Students in eligible households that show up as an 'N' on the list can be extended free eligibility, just remember to document how you determined they were eligible; and date and initial each update. The Determining Official may be able to use school enrollment records to find additional children who are part of a household.

Send out the current school year's *Direct Certification Notification letter* or consider contacting the parent or guardian to clarify specific names of children in their household. **Direct Certification** is explained in the USDA's [Eligibility Manual for School Meals](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-for-school-meals-july-2015.pdf), July 2015 which is posted at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-for-school-meals-july-2015.pdf>

Q. I run direct certification often and always put my downloaded match file from the state's Direct Certification Program (DCP) into my school's software program. Should I be saving a copy of the match file that comes from the state's DCP before putting it into my software program? Do I really need to save the file after every match I complete?

A. Yes, the match file should be downloaded and saved every time you run direct certification. It is very important to save the match file in a secure place. These files are as important as approved paper applications because they are your proof of eligibility. When the Department of Public Instruction (DPI) comes in to conduct your Administrative Review (AR), the consultant(s) will ask to see the original match file. If the original file is not available, your School Food Authority (SFA) will be cited and corrective action will be required. There is also the potential for fiscal action, depending on the specific situation.

The match file is returned from the DCP in a Notepad file format and the original match file should be saved to your computer. Along with saving it in the original format, the match file can be saved in Excel or any other software program you are using. You may also print the match files out and save them as a hard copy. It is important to save the file soon after you run direct certification, as match files are only available for download on the DCP for 14 days.

DC TIP: Create a direct certification folder on your computer to store all electronic direct certification files and/or create a file folder to house all paper direct certification documents. This will be especially beneficial during your SFA's AR, as you will have quick access to any direct certification documentation that is requested.

Q. What is the Community Eligibility Provision (CEP)? How do I participate? And what does this have to do with direct certification?

A. The Community Eligibility Provision (CEP) is a 4-year reimbursement option for eligible schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high poverty schools without collecting household applications. It is intended to improve access to free school meals in eligible schools. Instead of collecting meal applications, schools use data from the Direct Certification run (as well as other students eligible for free meals without a Free and Reduced Meal Application). A multiplier factor is applied, which is intended to estimate the number of free and reduced price meals that would have been served if applications were collected. The difference between the free claiming percentage and 100 percent represents the paid claiming percentage.

For further information please visit DPI's Community Eligibility webpage where you will find helpful material on this provision. <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>

Q: I have a student that was appointed to Kinship Care by the state. Is this considered a foster child? Is this student categorically (automatically) eligible for free meals?

A: Effective October 1, 2010, children formally placed in foster care are categorically eligible for free meals. As long as the child was appointed by the state or court system, they are considered to be eligible for free meals. Informal arrangements among relatives do not automatically qualify a child for free meals, but those coordinated by the state do. A child may still be considered foster child if placed with relatives provided the placement is made by the State or local foster care system or courts. In order to be considered categorically eligible for free meals, the state must retain legal custody of the child.

Children that show up as "E" codes on your direct certification match list are foster children matched with the state foster care system database and they are automatically eligible for free meals without any further paperwork. Determinations may also be made by appropriate documentation from the State (or county) child welfare agency or a court, or by having the household complete a paper application.

Documenting free meal eligibility for foster children is explained in the USDA's Eligibility Manual for School Meals, August 2013 which is posted at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-for-school-meals-july-2015.pdf>

Q: I have a family that was notified their child was qualified for free lunch via direct certification, but they say they have never applied for FoodShare or W-2 cash benefits and they want their name off the list. What should I do in this situation?

A: It is likely that the child has the exact same name and the same (or similar) date of birth (DOB) as another student in the State of Wisconsin that is receiving FoodShare and/or W-2 cash benefits. The Direct Certification Program (DCP) cannot distinguish a difference between two kids with the same name and DOB on the match since it only matches on these two identifiers.

You can assure the parents that with the direct certification process, their child's personal information is not being compromised. There is no sensitive data that the system matches on or sends to anyone. The only matching criteria are Name, Middle Initial (if provided), and DOB. The other child with the same name and DOB is receiving benefits under their own name and DOB (they just happen to be the same).

That said, we rely on the parents/guardians to correct these situations. In most cases, the family will let the school know their child is not eligible and, therefore, will decline the free meal benefits. If the parents/guardians have declined benefits, you may exclude that student from future direct certification runs. Alternatively, you may also continue to include this student's name on future direct certification runs, but be sure to make a note to yourself that the parents/guardians have declined benefits so that this student does not receive the free meal benefits. Remember, as with free and reduced price meal applications, a child's eligibility under direct certification is taken at face value. Therefore, if a child is identified as a match through direct certification, the child is automatically eligible for free meal benefits, regardless of any knowledge that the LEA may have about the household's circumstances.

Q: My school/district is not in the National School Lunch Program (NSLP), but we do participate in the Special Milk Program (SMP). Alternately, our LEA has half-day children with no access to NSLP or School Breakfast Program. These half-day children participate in the SMP. Are we required to run Direct Certification (DC) for SMP students?

A: If your school/district provides milk free of charge to all students (non-pricing plan) or if all students must pay for their milk (pricing plan, option 1), you do not need to qualify students for free milk benefits (either via application or DC). However, if your school/district provides milk free of charge to eligible students, you need to determine if students are qualified for free milk benefits. You can do this either through a paper application or DC. While you are not required to run DC for SMP students, you are encouraged to do so, as DC is a fast and efficient means to identify students who qualify for "free milk" under the SMP. Free milk applications should be sent out at the start of the school year in addition to running direct certification. Parents may also complete an application for free milk which is posted on the DPI website at the following address: <http://dpi.wi.gov/school-nutrition/milk-programs/special-milk>

Q. I know free meal eligibility can be extended to students who were not identified as directly certified, but are part of a household that is enrolled in FoodShare or W-2 cash benefits (S, T, or O codes). I also know that benefits cannot be extended to students in households of foster children (E codes) unless that household is also enrolled in FoodShare or W-2 cash benefits. What about other

categorically eligible students not included on the direct cert match file like Homeless, Migrant, Runaway, Head Start/Even start? Can benefits be extended to other students in these households?

A. No, benefits cannot be extended. Similar to having a foster child reside in the home, having a Homeless, Migrant, Runaway, or Head Start/Even Start student reside in a household does not automatically extend benefits to all children in the same manner as participation in FoodShare or W-2 cash benefits.